

NO. 08-18-00180-CR

IN THE EIGHTH COURT OF APPEALS
FOR THE
EIGHTH SUPREME JUDICIAL DISTRICT OF TEXAS

FILED IN
8th COURT OF APPEALS
EL PASO, TEXAS
5/3/2019 4:39:50 PM
ELIZABETH G. FLORES
Clerk

MARIO ERNESTO MARTELL,

Appellant.

VS.

THE STATE OF TEXAS,

Appellee.

On Appeal in Cause No. 990D03958
In the CRIMINAL DISTRICT COURT ONE
El Paso County, Texas
The Hon. DIANE NAVARRETE, Judge Presiding

THIRD MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT'S BRIEF

TO THE HONORABLE COURT OF APPEALS:

COMES NOW MARIO ERNESTO MARTELL, Appellant, and files his third motion requesting an extension of 30 days within which to file the Appellant's Brief. In support of this motion, Appellant would show the Court the following:

I.

On August 19th, 1999, Appellant was indicted for POSS MARIJ<=50LBS>5LBS in the Criminal District Court Number One of El Paso County. Appellant was sentenced to the Texas Department of Criminal Justice under deferred adjudication. Thereafter, on September 12, 2018, Appellant was adjudicated to a suspended sentence, Hon. Diane Navarrete, Judge Presiding. Appellant's revocation attorney was Maya I. Quevedo Stevenson, 500 E. San Antonio Suite 501, El Paso, TX, 79901.

II.

On October 10th, 2018, Appellant filed his Notice of Appeal. The Appellant's brief is now due May 5th, 2019. Appellant respectfully requests an extension of thirty days, that is, until June 4th, 2019. Two prior extensions of time have been requested or granted.

III.

Appellant's request for an extension is based upon the following facts:

1. The undersigned attorney is responsible for litigation support and research for the El Paso County Public Defender's Office. In this role, Counsel addresses numerous legal issues as trial counsel that arise on short notice.
2. Counsel for Appellant also has primary responsibility for two (2) cases

that are set for jury trial in the month of May.

In light of the above matters, and in order to adequately and effectively discharge her responsibilities to the Appellant, the undersigned counsel respectfully requests a 30-day extension of time in order to properly prepare and present the brief for the Appellant.

WHEREFORE, Appellant and the undersigned counsel pray that the Court grant this motion and extend the deadline for filing the brief for Appellant to June 4th, 2019.

Respectfully submitted,

EL PASO COUNTY PUBLIC DEFENDER

BY: **/S/ Maya I Quevedo**
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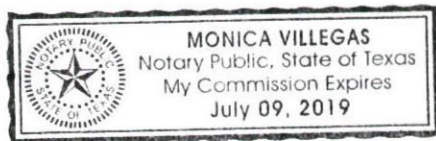
THE STATE OF TEXAS §
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COUNTY OF EL PASO §

BEFORE ME, the undersigned authority, appeared MAYA I. QUEVEDO STEVENSON, on the 3rd day of May, 2019, and who, being by me duly sworn, did depose and state on his oath:

"My name is MAYA I. QUEVEDO. I am the Attorney for Appellant in the above styled and numbered document, and the above stated facts are true and correct and within my personal knowledge."

BY: 
MAYA I. QUEVEDO STEVENSON

SUBSCRIBED AND SWORN TO BEFORE ME this 3rd day of May, 2019.




NOTARY PUBLIC, State of Texas
My Commission expires:

CERTIFICATE OF SERVICE

I, MAYA I. QUEVEDO, certify that a true and correct copy of the foregoing instrument has been e-mailed to the District Attorney's Office at DAAppeals@epcounty.com and mailed to Appellant MARIO ERNESTO MARTELL on this the 3rd day of May, 2019.

BY: /S/ Maya I Quevedo
MAYA I. QUEVEDO STEVENSON